

Richmond Division

Defendant.

**DEFENDANT THE CITY OF RICHMOND, VIRGINIA’S MOTION
TO EXCEED THIRTY PAGES FOR A MEMORANDUM IN
SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

2. The facts of this case cover nearly a 10-year period. During that time, each Plaintiff has experienced working conditions and circumstances that are unique and individualized. For example, each Plaintiff began his employment with the City at a different time. Many of the Plaintiffs had separate and distinct responsibilities, and reported to separate

managers. Some of the Plaintiffs applied for supervisory positions, while others did not. Some of the Plaintiffs received training, while others claim that they did not. Most importantly, some of the Plaintiffs claim to have been subjected to specific instances of racial discrimination or harassment, while others tell a much different story.

3. The parties have engaged in extensive discovery to date, having completed approximately twenty depositions, with approximately twenty additional depositions that are expected to occur prior to July 22, 2013, when discovery closes. In addition, the parties have exchanged thousands of documents.

4. The City has substantial legal defenses to each of the claims presented in this action, and is currently preparing a memorandum in support of its motion for summary judgment, which is due by August 1, 2013. Although the City intends to comply with the expectation of brevity and conciseness in its summary judgment memorandum, it cannot adequately inform the Court of the bases for summary judgment in thirty pages, particularly given the complex and unique facts presented by each of the eight Plaintiffs.

5. In the interest of justice, and so that the City may present all of its defenses to the claims raised by the Plaintiffs, the City is respectfully seeking leave to submit a summary judgment memorandum that shall not exceed fifty (50) double-spaced pages. If granted, the City will endeavor to be as concise as possible with respect to the facts and arguments that it intends to make.

WHEREFORE, The City of Richmond, Virginia respectfully requests that the Court enter an Order allowing it to submit a memorandum in support of its motion for summary judgment not to exceed fifty (50) double-spaced pages.

THE CITY OF RICHMOND, VIRGINIA

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CERTIFICATE OF SERVICE

This is to certify that on this 1st day of July, 2013, I sent the foregoing to Plaintiffs'

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